

ATTACHMENT A

Significant Omissions And Deficiencies in the Ameritech Illinois Plan Of Record for Operations Support Systems (“OSS”)

The following is a brief “checklist,” based on the AT&T Comments, of information and topics that should be included in SBC/Ameritech’s OSS Plan Of Record:

- 1. Conformance with Industry Standards** – SBC/Ameritech must set forth plans to move to specified industry standards for its interfaces for **preordering, ordering, repair and billing**, including the extent to which each interface will conform to or diverge from the industry standards. Its Plans should identify the steps it will take to cure non-compliance over identified periods of time, with interim milestones. The Plan should also include full description of the manner in which proposed changes in functionality in its pre-ordering, ordering, etc. systems will be implemented.
- 2. Change Management Process** – The POR should include the methods and procedures that Ameritech will follow in announcing changes to its OSS, interfaces and operations to the industry, and the timetables that it will use to implement changes according to the various types of changes. Changes include emergency fixes to software and systems, changes required to fulfill regulatory commitments, changes to conform systems and operations to achieve industry standards, and other process improvements. The Change Management Process also should provide a means for CLECs to request Ameritech to undertake improvements that are necessary for the industry.
- 3. Documentation and Specifications** – The POR should describe the ways in which Ameritech will provide CLECs with updates to its OSS interface documentation and the technology it will use to distribute them or otherwise make them available to CLECs.
- 4. Support Services Process** – The POR should include a description of the ways in which CLECs will receive technical support for implementation of interfaces with Ameritech’s OSS. The magnitude of the changes over the next several years requires that CLECs be provided with technical and business support (e.g. through the Ameritech Support Centers and Ameritech Resource Center) so that CLEC interfaces can be maintained and be changed in conjunction with the Ameritech systems.

5. CLEC Testing Environments – The POR should include the computer systems and processes that Ameritech will make available for CLECs to test changes to interfaces with Ameritech prior to implementing the production versions of systems and interfaces. Testing will be required for interface changes in existing interfaces as well as for new interfaces that Ameritech will be providing.

6. Performance Measurement Processes – For the OSS changes that Ameritech intends to implement, the Plan should include corollary changes in its performance measurement systems. With new OSS functions and for those that involve changes in the ways CLECs interact with Ameritech, the ways in which they will be measured to demonstrate that they deliver the planned enhancements to operations should be specified.

7. Business Processes – Processes that surround the OSS functions should be addressed within the Plan to fully describe the nature of changes that Ameritech intends to implement. AT&T has mentioned two in its Comments, **loop “hot cuts”** and **order “flow-through”** that are obvious omissions from the Ameritech Plan.